



2025 Third Party Verification Kickoff Training

Office of Greenhouse Gas Programs

February 2025



Purpose

To provide important 3PV reminders that apply to all CFP and GHG Reporting program verifiers and verification bodies



Agenda

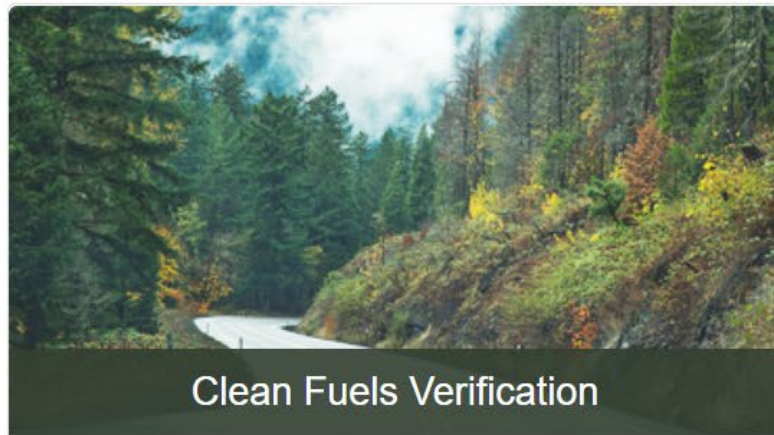
- Resources
- 2025 program updates
- Common mistakes from verifier exams
- DEQ Forms
- Important reminders



Resources

Resources for verifiers and verification bodies

www.oregon.gov/deq/ghgp/3pv/



[Information for Verifiers](#)

[Information for Verification Bodies](#)

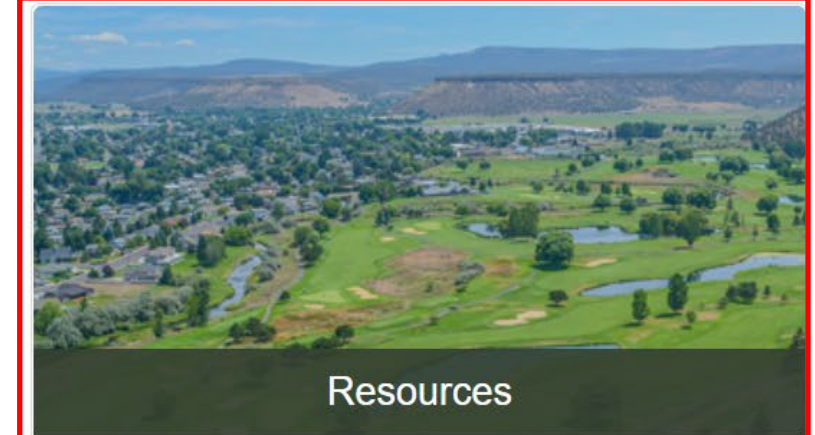
[Information for Responsible Entities](#)



[Information for Verifiers](#)

[Information for Verification Bodies](#)

[Information for Responsible Entities](#)



[Program Rules \(OAR 340-272\)](#)

[Implementation Timeline](#)

[Sign-up for program updates](#)



Verification resources

- Resources are included at the bottom of each page

How do I become a verifier?

To become a verifier for CFP, you will need to be accredited by the California Air Resources Board in the areas for which you intend to perform verification, as indicated in the below chart. You will also need to take and pass qualification exams for Oregon qualification.

CFP Activities

- Course 1: General (Mandatory) requires CARB accreditation for Non Lead Verifier or Lead Verifier
- Course 2: Fuel Pathways requires CARB accreditation for Lead LCFS Verifier for Fuel Pathways
- Course 3: Quarterly Transaction Reports requires CARB accreditation for Lead LCFS Verifier for Alternative Fuel Transactions

DEQ opens a new training and exams period for CFP verifiers annually; when applications become available, they will appear on this page. CFP is not accepting verifier applications at this time.

- [Frequently Asked Questions: Verifier Applications, Training and Exams](#)

Resources for approved verifiers

- [Program Rules \(OAR 340-253\)](#)
- [Oregon Clean Fuels Program Verifier FAQ](#)
- [Notice of Verification Services form](#)
- [Verification Statement form](#)



2025 program updates



Differences in process by program

Greenhouse Gas Reporting Program:

- Reporting and verification forms in Your DEQ Online (YDO) for permitted sources, electricity suppliers, natural gas suppliers and natural gas systems

Clean Fuels Program and liquid fuel suppliers reporting to the GHG Reporting Program:

- Hybrid manual/digital, utilizing OFRS
- COI and NOVS administered in Adobe Sign
- Verification statement administered in Adobe Sign and submitted within OFRS



GHG Reporting Program data access

- If you are a newly qualified GHG Reporting Program verifier or verification body, you will need an account in Your DEQ Online (YDO) in order to prepare verification forms.
- Instructions on account signup can be found at <https://www.youtube.com/watch?v=zN61RcjgXM8> or by searching "Your DEQ Online Account Registration for Third Party Verification".
- Verifiers should select the "Consultant" account type and verification bodies should select the "Responsible Official" account type. NOTE: Consultant accounts cannot submit forms, so all submissions must go through your verification body.
- Please let us know if you have created a new account so we can set up the proper permissions for you.
- Contact us at 3PVerify@deq.oregon.gov if you have tech support needs.



Clean Fuels Program rule updates

- In January 2025, Oregon's Environmental Quality Commission adopted updates to Division 253, the Oregon Clean Fuels Program regulation
- Fuel pathway applicants must now hire a verification body to perform validation of their pathway application
- OR-GREET model was updated. For 2025 verifiers must review both the GREET 3.0 and GREET 4.0 models for pathway verifications.
- **Current rule can be found on the SoS website:**

<https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=1560>



Climate Protection Program

- In 2024, Oregon's Environmental Quality Commission re-adopted the Climate Protection Program under a new division number, OAR 340 Division 273.
- Updates adopted in 2024 took effect upon adoption
- All CPP regulated entities are subject to verification regardless of their reported emissions level
- New version of rule adds Energy Intensive and Trade Exposed entities (EITEs). Most of these are already subject to verification but a few new companies will join the verification program this year under this requirement.
- **Current version of Climate Protection Program Rule:**
<https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=8651>



Less Intensive Verification

2025 is a less intensive verification year for entities meeting the following conditions:

- No change in verification body from prior year
- No change in operational control from prior year
- Received a Positive verification statement in the prior year

Less Intensive Verification

| 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 |
|-----------------------------|-----------------------------|-------------------|-----------------------------|-----------------------------|-------------------|-----------------------------|
| Less intensive verification | Less intensive verification | Full verification | Less intensive verification | Less intensive verification | Full verification | Less intensive verification |

Less intensive verification applies for two years of every three for qualifying entities.

Less intensive verification means:

- A site visit is not required
- The verification body may use the risk assessment developed as part of its most recent sampling plan to complete verification.



Less Intensive Verification

NOVS form note for Less Intensive Verification years:

- Verification bodies will notice the NOVS form includes space to indicate when an entity meets the less intensive verification requirements.
- When the less intensive verification requirements are met, you will not be required to enter a site visit date.



Common mistakes from verifier training



General feedback

- Please only use the version of each rule that appears on the Oregon Secretary of State website: https://sos.oregon.gov/archives/Pages/oregon_administrative_rules.aspx
- Versions of the rules that appear on other sites you find through a web search are NOT official and may be outdated.

Reading Division 272

Division 272 contains provisions specific to the GHG Reporting Program and provisions specific to the Clean Fuels Program, as well as provisions that apply regardless of the program the entity reports to. In this example from the section on data checks, section (2) applies to both programs;

Section (3) are requirements that apply specifically to data checks performed for data submitted under the Clean Fuels Program (Division 253);

Section (4) are requirements that apply specifically to data checks performed for data submitted under the GHG Reporting Program (Division 215)

340-272-0430

Data Checks

(1) Verification services must include data checks that meet the requirements of this rule.

(2) All data checks must meet the following requirements:

(3) In addition to meeting the requirements under section (2), data checks for CFP reports and fuel pathway applications submitted under OAR chapter 340, division 253 must also meet the requirements of this section:

(a) Data checks must be chosen based on the relative contribution to greenhouse gas emissions or reductions and the associated risks of contributing to material misstatement or nonconformance, as indicated in the sampling plan;

(b) At a minimum, data checks must include:

(4) In addition to meeting the requirements under section (2), data checks for GHG Reporting Program emissions data reports submitted under OAR chapter 340, division 215 must also meet the requirements of this section:

(a) Data checks must be used for emissions sources and fuel and electricity transactions data, as applicable, based on their relative contributions to emissions and the associated risks of contributing to material misstatement or nonconformance, as indicated in the sampling plan;

(b) At a minimum, data checks must include:



Sector-specific feedback

Permitted stationary sources:

- Use global warming potentials from IPCC Assessment Report 4 when recalculating emissions
- Watch significant digits in calculations
- Watch for the correct units in reporting



Sector-specific feedback

Liquid fuel suppliers:

- All fuel transfers must be documented through Product Transfer Documents (PTDs) that include fuel quantities associated with the certified Fuel Pathway Code (FPC).
- When recalculating emissions, don't assume all pollutants from a biomass-derived fuel are biogenic. Only CO₂ emissions from a biomass-derived fuel should be separately reported as biogenic. CH₄ and N₂O emissions are considered anthropogenic.
- Don't conflate CO₂ and CO₂e. CO₂e stands for CO₂ equivalents. This means that CH₄ and N₂O should be calculated using the appropriate emission factors for the fuel type and adjusted using the global warming potentials. These are then added to any CO₂ emissions for the fuel type and reported in addition. If only CO₂ emissions are requested during data reviews, the CH₄ and N₂O GWP adjusted emissions may not be reported.



Sector-specific feedback

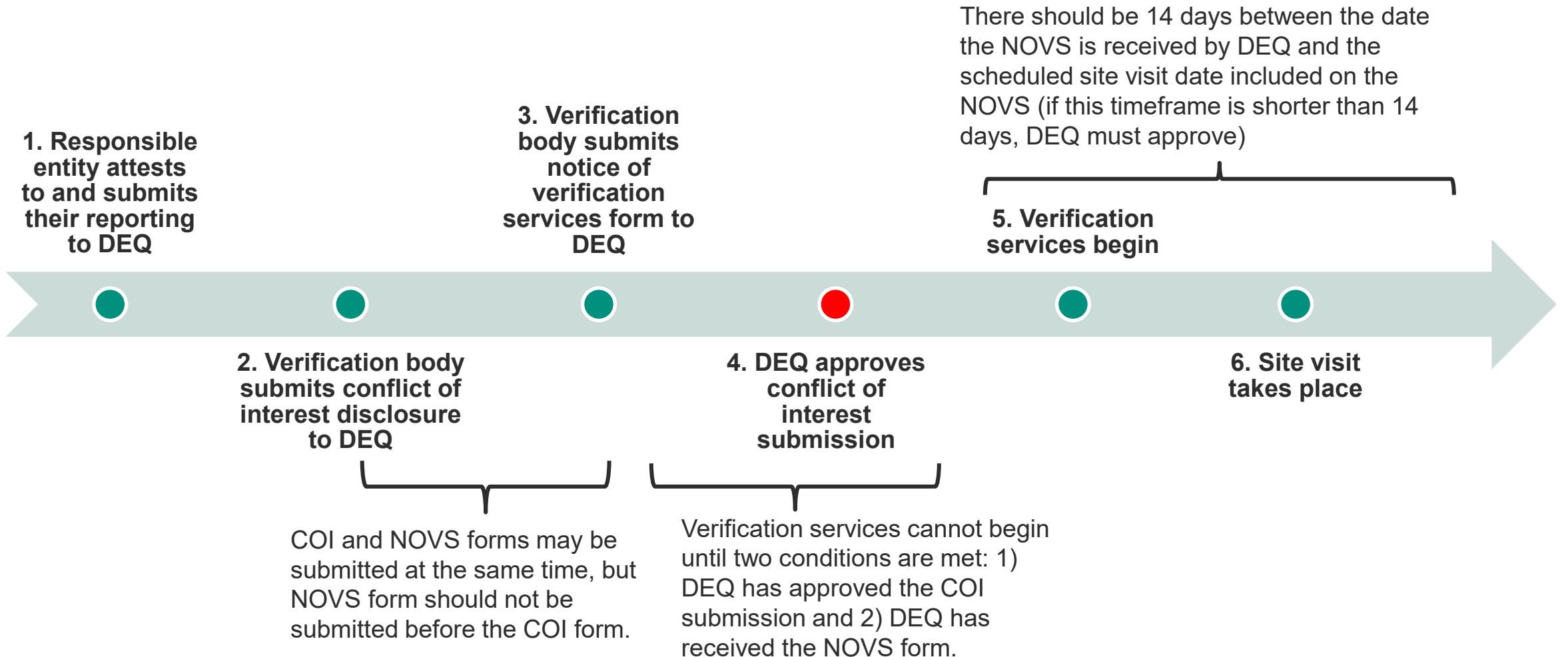
Fuel pathways:

- This year, you must review both the old GREET 3.0 model and the new GREET 4.0 model when verifying fuel pathways



DEQ forms

Timing of form submissions





Form reminders

- When filling in the NOVS, please include the address of the site visit even if visiting a headquarters
- New COI/NOVS form submittals are required if:
 - There has been an addition to the verification team (e.g. new DEQ-approved verifier was hired; best practice is to include all individuals who may participate in verification)
 - There have been changes to the organizational structure of the verification body (e.g. merger, acquisition or divestiture)
 - Circumstances have changed such that a new potential for conflict of interest has arisen
 - It is a new verification year (save a copy of your submission)
- New form submittals are NOT required if:
 - Someone has left the verification team



Adobe Sign

Each form has a time limit of 60 minutes. If the form times out, try the following:

- Using a different web browser to open the form
- Using a private window in your browser to open the form
- Clearing your browser's cache/cookies
- Disconnecting from VPN to fill in the form

If you still have problems with the form timing out after trying these, please contact 3PVerify@deq.oregon.gov.



Adobe Sign

Option to submit a form will appear once all required fields are filled in

Forms **CANNOT** be modified once submitted- contact DEQ if you need to make a change

There is a **size limit** on file attachments: 10MB (or 100 pages)

- If you need to attach a file that exceeds these limits, please email it to us directly



Adobe Sign

Text boxes:

- Should re-size your text to fit the space allotted when the form is submitted, but if there is a lot of text, may look “cut-off”
- **DEQ will still get your full submission!**
- If you’re concerned your copy won’t have the full text:
 - Copy/paste your saved text into a separate document
 - Email us, we can send you an excel version

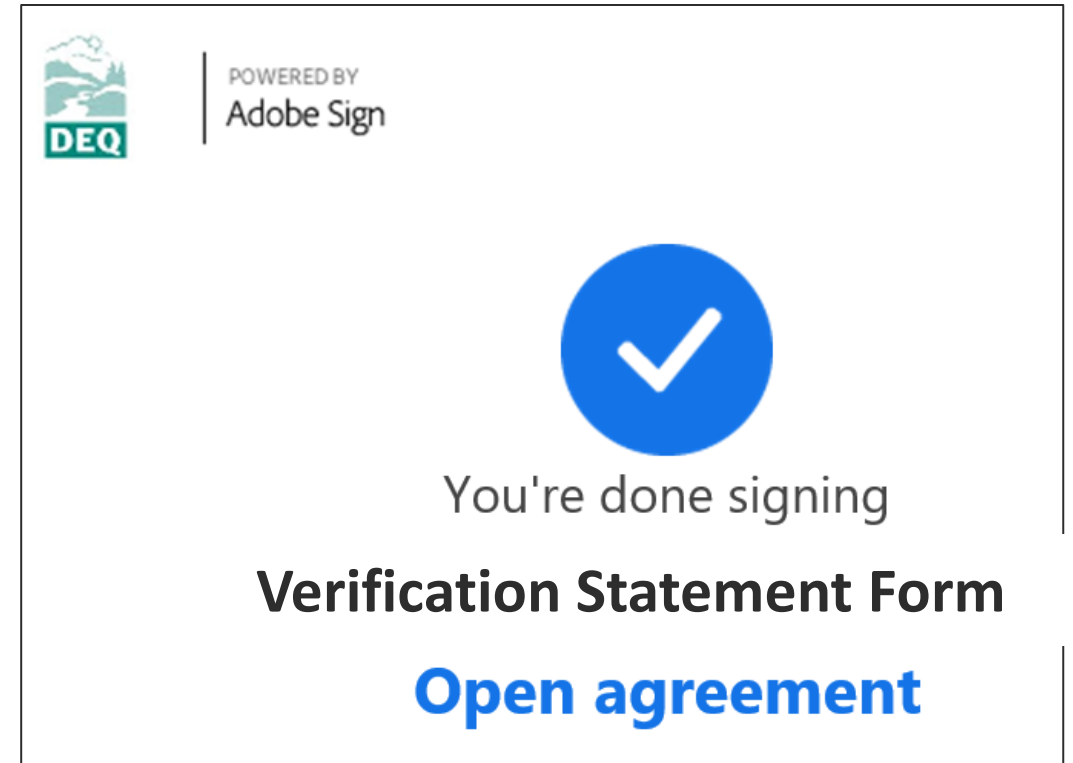
3PVerify@deq.oregon.gov

Adobe Sign

Once signed and submitted, Adobe Sign will send an authentication link to the email provided on the form.

Once you click this link, you should see an onscreen confirmation your form has been submitted.

You will also receive a confirmation email from Adobe Sign, which will include a link to save and print a copy of the form for your records.





Important reminders



Materiality

- **All correctible errors must be corrected**, even if they are less than 5% of reported emissions or credit/deficit calculations
- A correctible error is defined as any error that impacts reported emissions for the Greenhouse Gas Reporting program, or credit/deficit calculations for the Clean Fuels program



Related entities

Both OAR 340-253 and OAR 340-215 define related entities as follows:

“Related entity” means any direct parent company, direct subsidiary, or a company with common ownership or control.

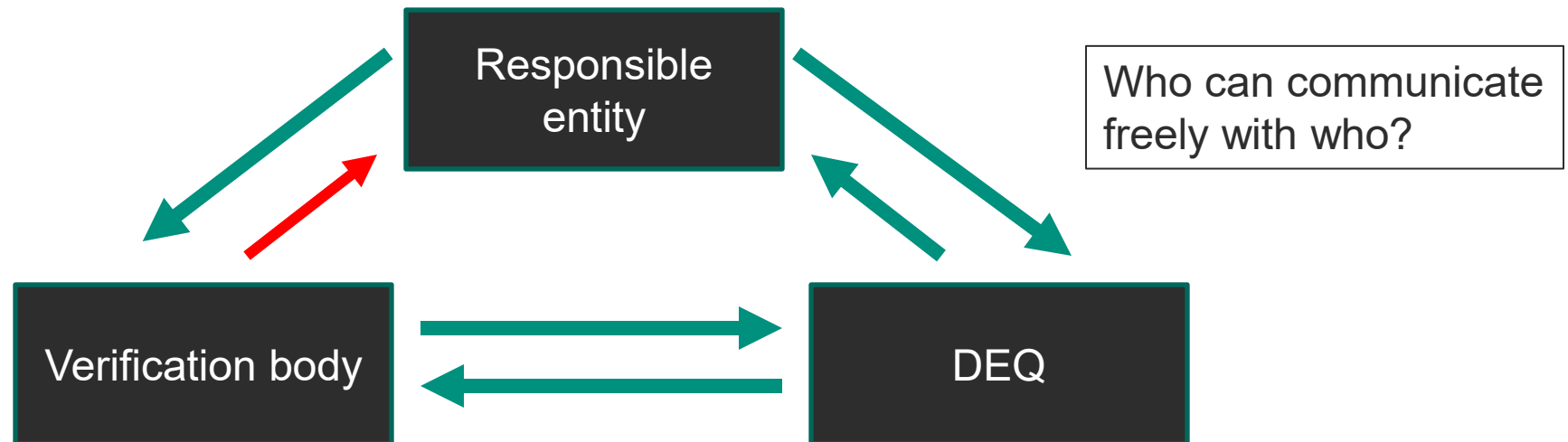
According to OAR 340-272, related entities must aggregate together when determining whether they are exempt from verification requirements.

For the purposes of determining third party verification applicability, “common ownership or control” is any percentage of ownership or control over another company.

Example: Company A and Company B each own 50% of company C, though Company C is under the complete operational control of Company A. If the three companies together meet the threshold for verification, all must have their data verified- even if one or more of them do not meet the threshold independently.

Communications

- Verifiers and verification bodies may request information from the responsible entity, but they may NOT consult during the verification process
- Consulting = offering any advice about calculating or reporting emissions, how to correct errors, fixing management systems, etc.





Communications

Please do:

- Reach out to DEQ with technical questions about verification
- Alert the client to nonconformances with the regulatory requirements
- Maintain impartiality

Please do not:

- Advise clients on how to correct reporting
- Communicate to DEQ on behalf of the client
- Provide regulatory interpretations



Verification team considerations

Subcontractors can be used BUT:

- Only if they are DEQ approved
- The verification body takes full responsibility for the verification services provided by the subcontractor
- Use of a subcontractor is subject to the same COI requirements as other verifiers
- Subcontractors may not further subcontract

Verifiers-in-training may be added to verification teams and do not need to be DEQ approved, BUT:

- **MUST** be under direct supervision of the lead verifier at all times
- Must be included on the conflict of interest disclosure and notice of verification services form



DEQ audits

- DEQ periodically audits verification bodies
- Upon written request by DEQ, the verification body must provide to DEQ the verification report given to the responsible entity, as well as the sampling plan, contracts for verification, and any other supporting documents, within 14 calendar days
- Upon written notification by DEQ, the verification body must make itself and its personnel available for a DEQ audit
- DEQ may occasionally observe the verification body during a site visit



DEQ audits

What you'll receive from DEQ:

- Brief report containing any regulatory nonconformances discovered during the verification year, by verifier
- Also may include other opportunities for improvement
- DEQ keeps these reports on file
- Repeat violations may jeopardize the verifier's approval to provide services in Oregon

Maintaining your DEQ approval

| When to contact DEQ: | Verification Body | Verifier |
|---|-------------------|----------|
| Immediately if you update, lose or withdraw your CARB or ANSI accreditation | ✓ | ✓ |
| Immediately with updates to insurance coverage documentation or administrative or judicial actions | ✓ | |
| Within 30 days if you no longer meet the requirements for DEQ approval under OAR 340-272-0220 | ✓ | ✓ |
| Within 30 days if there has been a change in verifier staffing at the verification body | ✓ | |
| Within 20 days of notification of a nonconformance in any other voluntary or mandatory GHG or fuels reporting program (Include the notification from the agency or body that administers the program and corrective actions taken) | ✓ | ✓ |



COI monitoring

- Verification bodies and responsible entities are required to monitor the potential for conflict of interest for one year following the completion of verification services and report any new potential conflicts to DEQ.
 - Report any new contracts between the verification body and responsible entity or new conflict of interest circumstances within 30 days
 - Include information about the work to be performed
 - DEQ will determine whether the new contract or circumstance impacts the ability of the verification body to provide services for the responsible entity



Updating your info

Verifiers:

- Contact information that appears in approved lists
- Employment updates (moving verification bodies or becoming independent)

Verification bodies:

- Contact information that appears in approved lists
- Employment updates
- Insurance documentation
- Accreditation documentation

Deadline: March 15



Contacting DEQ- for verifiers

Contact DEQ if:

- You have a question about a report you are verifying
 - Include enough detail for DEQ to look up the report you have a question about (at least company name and report type, and Source ID number for stationary sources)
- You are having trouble getting information from the responsible entity in a timely manner
- You have concerns about the responsible entity being able to meet the verification deadline
- Technical questions about reporting corrections should be asked by the entity

3PVerify@deq.oregon.gov



Title VI and alternative formats

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities.

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